

THE LAW OFFICES OF SEAN M. MAHER, PLLC

MEMO ENDORSED

November 27, 2023

VIA ECF

Hon. Kenneth M. Karas
United States District Judge
United States Courthouse
300 Quarropas Street
White Plains, New York 10601

Re: *United States v. Chellel et al.* (Indigo Grant), 21 Cr. 441 (KMK)
Travel request for Defendant Indigo Grant

Dear Judge Karas:

On behalf of defendant Indigo Grant, I write to request permission for Ms. Grant to travel from Atlanta to Washington, D.C. from November 30 through December 3, 2023.

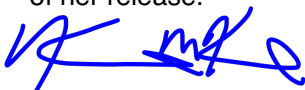
Ms. Grant is on pretrial release on conditions including location monitoring. She lives in Atlanta and has been directly supervised by Pretrial Services Officer Ben Heath from the Northern District of Georgia. Ms. Grant has received an invitation to an awards gala in Washington, D.C. that she would like to attend for professional networking purposes. The invitation is attached as Exhibit A. The defense proposes that Ms. Grant leave Atlanta on Thursday, November 30, and return on Sunday, December 3, 2023.

I have emailed with PTS Officer Ben Heath in Georgia and PTS Officer Leo Barrios here in our District and both inform me that they have no objection to Ms. Grant's travel request. I have communicated this request to the government and have been informed by AUSA Nicholas Bradley that the government objects to Mr. Grants' travel request.

The Court's consideration is greatly appreciated.

Application is denied. Given Ms. Grant's previous history of being less than honest with the Court and the vague rationale offered for the need to attend the event, the Court is not confident in Ms. Grant's compliance with the conditions of her release.

Respectfully submitted,



11/28/23

/S/

Sean M. Maher
Counsel for Indigo Grant

cc: All counsel via ECF